FILED Clerk **District Court**

Robert D. Bradshaw PO Box 473 1530 W. Trout Creek Road Calder, Idaho 83808 Phone 208-245-1691

Plaintiff, Pro Se

NOV 1 0 2005 For The Northern Mariana Islands (Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW) Civil Action No. 05-0027
Plaintiff	
v .	
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS (hereafter referred to as the CNMI); et. al.) AFFIDAVIT IN SUPPORT OF) MOTION TO COURT TO ENTER) A DEFAULT JUDGMENT) AGAINST DEFENDANT
Defendants) ROBERT A. BISOM

- 1. Defendant ROBERT A. BISOM was served with the complaint, amended complaint and summons on October 11, 2005, per Return of Service forms filed in the Court on this case. Service was made on his attorney Jay H. Sorensen.
- 2. Jay H. Sorensen has represented Mr BISOM on legal matters in several cases previously before this Court and before the CNMI Superior and Supreme

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07/09

Courts. Mr Sorensen filed documents and made representations on CNMI Superior Court Civil Case 96-1320 from 1996 to March 2003. In 2005, Mr Sorensen continued to represent Mr BISOM on CNMI case 96-1320 in further litigation. On October 11, 2005, Mr Sorensen reportedly appeared by phone on behalf of Mr BISOM in the CNMI Superior Court for an oral presentation on civil case 96-1320.

- 3. On September 17, 2005, Mr Sorensen sent Robert D. Bradshaw, a defendant in case 96-1320, the attached request for interrogatories (Exhibit "A"). Mr Sorensen was identified as the "Attorney for Plaintiff and Judgment Creditor." In other documents filed in the CNMI courts in 2005, he also referred to himself as the Attorney and Judgment Creditor for Mr BISOM.
- 4. In September 2005, BRADSHAW served summons, complaint and amended complaint by certified mail, return receipt, on ROBERT A. BISOM, c/o Jay II. Sorensen, Attorney for Robert A. Bisom, at Mr Sorensen's attorney business address of c/o Shanghai, PO Box 9022, Warren, MI 48090-9022 (see the enclosed copy of the mailing envelope--Exhibit "B"). Mr Sorensen or his agent accepted this service and returned the signed postal receipt, as now filed in this court's case file for 05-0027 (see Exhibit "C").
- 5. In a previous case against both Mr BISOM and Mr Sorensen in the US District Court of Idaho (case 05-0084), Mr BISOM was also served via his attorney Jay H. Sorensen at Mr Sorensen's mailing address In Somis, California in April 2005. This service was made for both Messers BISOM and SORENSEN on Mr Sorensen's supposed agent Cynthia Sorensen, a co-occupant with Mr Sorensen at the Sorensen house in Somis. Reportedly, she forwarded both the summons and complaints for

08/09

- 6. A local Idaho law firm, Ramsden and Lyons of Coeur d'Alene, Idaho, represented both Messers SORENSEN and BISOM in the US District Court of Idaho.
- 7. There is no documentation on file in the CNMI Superior Court indicating or allowing that Mr Sorensen no longer represents Mr BISOM (according to oral information supplied BRADSHAW by CNMI Clerk of Court Bernie Sablan).
- 8. Mr SORENSEN was also served for case 05-0027 on Oct 11, 2005 at his business address in Warren, Michigan. He filed an application, as the defendant pro se, in the CNMI US District Court on Oct 26, 2005, asking for an extension of time to file his answer on the complaint against himself until Dec 8, 2005.
- 9. Plaintiff's Affidavit on default and a bill of costs are enclosed for case 05-0027 as well as the preceding costs on CNMI case 96-1320 and USDC ID case 05-0084 which were claimed in the pleadings on USDC CNMI case 05-0027 (Exhibits D, E, F and G). Actual damages are \$147,230.00 (including costs from 96-1320 and 05-0084), punitive damages are \$750,000.00, and costs for 05-0027 are \$2220.00--all of which total to \$899,450.00.
- 10. On the BISOM complaint and summons, default commenced on Nov 1, 2005 when Defendant BISOM failed to appear and answer the summons served on him.

Robert D. Bradshaw, Plaintitt, Pro Se

09/09

	STATE OF IDAHO COUNTY OF BENEWAH		
	Jerry Lee Nelson		, Notary in and for the State of
	Idaho, residing at St. Ma	ries, Idaho	do hereby certify that on
	this <u>10</u>	day ofNovember	2005, personally
	appeared before me Rober	t D. Bradshaw, to me know	n to be the individual described
	in and who executed the wi	ithin instrument for the use	s and purposes herein
	mentioned.		
	Given Under My hand and	Official Seal; this 10	day of <u>November</u> 2005.
•		NO PARY PUBLIC IN	AND FOR THE STATE OF IDAHO
	JERRY LEE NELSON Notary Public State of Idaho	MY APPOINT	MENT EXPIRES
1	desce at tablic	11/15/07	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the day of Nov 2005, I caused to be served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, Mi 48090-9022 The Attorney General, 2d Floor of the Juan A. Sablan Memorial Bldg, Caller Box 10007, Capitol Hill, Saipan, MP 96950.

Hobert D. Bradshaw, Plaintiff, Pro Se

JAY H. SORENSEN Attorney at Law c/o Shanghai P.O. Box 9022 Warren, MI 48090-9022 Phone (Shanghai, China): 86-21-5083-8542

Attorney for Plaintiff and Judgment Creditor

IN THE SUPERIOR COURT OF THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ROBERT A. BISOM)	CIVIL ACTION NO. 96-1320
Plaintiff,)	INTERROGATORIES
v.)	TO DEFENDANT . ROBERT D. BRADSHAW
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS, ROBERT D.	1)	
BRADSHAW, former Temporary Public	į	
Auditor, in his individual capacity, et al.)	
Defendants.)	

To: ROBERT D. BRADSHAW, P.O. Box 473, 1530 W. Trout Creek Road, Calder, Idaho 83808

Plaintiff, ROBERT A. BISOM, serves these interrogatories on ROBERT D. BRADSHAW, as authorized by Rule 33, Commonwealth Rules of Civil Procedure. ROBERT D. BRADSHAW must serve his answer to each interrogatory separately and fully, in writing and under oath, within 30 days after service.

DEFINITIONS

The following terms have the following meanings, unless the context requires otherwise:

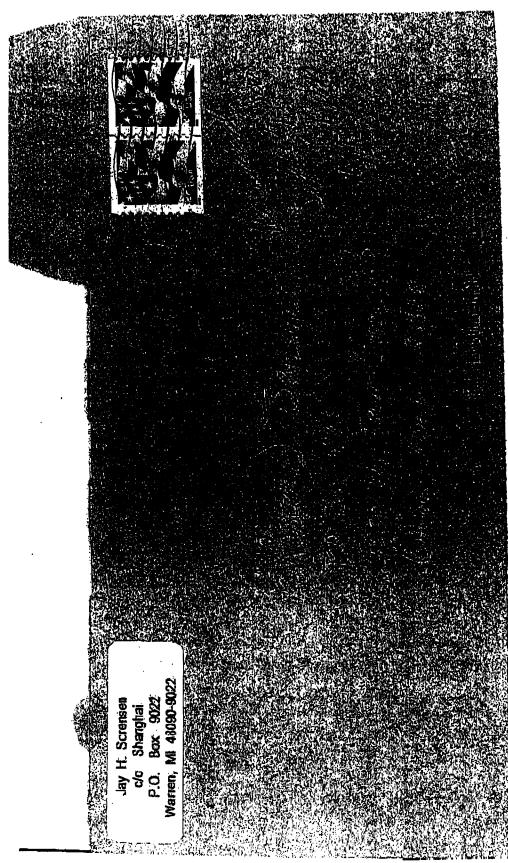
- A. Parties. The term "plaintiff" or "defendant," as well as a party's full or abbreviated name or a pronoun referring to a party, means the party and, where applicable, {his/her/its} agents, representatives, officers, directors, employees, partners, corporate parent, subsidiaries, or affiliates. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.
- B. Person. The term "person" is defined as any natural person, any business, a legal or governmental entity, or an association.

- C. <u>Document</u>. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a) and includes computer records in any format. A draft or nonidentical copy is a separate document within the meaning of this term. The term "document" also includes "any tangible things" as that term is used in Rule 34(a).
- D. Communication. The term "communication" means the transmittal of information in the form of facts, ideas, inquiries, or otherwise.
- E. <u>Identify</u> (person). When referring to a person, "identify" means to give, to the extent known, the person's full name, present or last known address, telephone number, and, when referring to a natural person, the present or last known place of employment. Once a person has been identified in compliance with this paragraph, only the name of that person need be listed in response to later discovery requesting the identification of that person.
- F. Identify (document). When referring to documents, "identify" means to give, to the extent known, the following information: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the authors, addressees, and recipients of the document; (c) the location of the document; (f) the identity of the person who has custody of the document; and (g) whether the document has been destroyed, and if so, (i) the date of its destruction, (ii) the reason for its destruction, and (iii) the identity of the person who destroyed it.
- G. Relating. The term "relating" means concerning, referring, describing, evidencing, or constituting, directly or indirectly.
- H. All/Each. The terms "all" and "each" should be construed as "and," "each," and "and/or."
- I. Any. The term "any" should be understood in either its most or its least inclusive sense as necessary to bring within scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
- And/Or. The connectives "and" and "or" should be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
- K. Number. The use of the singular form of any word includes the plural and vice versa,

- 1. As to any real property in which you have any ownership interest, please:
 - 1.1 State its description, in terms of location, size and improvements;
- 1.2 Identify any liens against it, including the type of lien, the name and address of the lien holder and the balance of any debt secured by the lien.
 - 1.3 Describe the nature of your interest.
- 2. As to any accounts you have at any financial institution, please state:
 - 2.1 The name and address of the financial institution and your account number;
 - 2.2 The balance in the account at this time:
 - 2.3 The balance in the account on March 1, 2004.
- 3. As to any item of personal property that you own with a market value in excess of US\$500.00, please:
 - 3.1 Describe the item:
 - 3.2 Identify the place where you keep the item;
 - 3.3 State the value of the item, as best you can estimate;
- As to all money you have in cash at this time, please state:
 - 4.1 How much, and if in currency other than United States, identify what currency;
 - 4.2 Where it is held.
- 5. As to any transfers of any assets or property with a value of over US\$500.00 from you since May, 2000, please:
 - 5.1 Idenntify the asset or property;
 - 5.2 Identify the person to whom the asset or property was transferred;
 - 5.3 The date of the transfer;
 - 5.4 Explain why you made the transfer.

- 6.1 Identify the nature of the debt or liability as to why it is owed and the amount'
- 6.2 Identify the person or other entity to whom it is owed.
- 7. Please state your net worth at this time, including an explanation of how you calculated or estimated it.
- 8. As to any employment or business you have, or have had during the past three years, please:
 - 8.1 Discribe the nature of that employment or business;
 - 8.2. Identify the employer or business as to name, address and telephone number;
 - 8.3 State the amount of income you have derived from that employment or business for the last three years.
 - 9. As to any other source of income not previously described in answer to interrogatories above, which you have at the present time, please:
 - 9.1 Identify the source of that income;
 - 9.2 Describe what income you receive from that source, including the amount and frequency you receive it:
 - 9.3 State the reason that you receive that income.
 - 10. Please describe any travel you have done outside the United States during the last five years, including the destination(s), inclusive dates of the visit(s), and reason for the travel.

H. Sorensen Attorney for Plaintiff Robert D. Bradshaw P.O. Box 473 1530 W. Trout Creek Road Calder, Idahu 83808

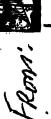






UWITED STATES FOSTAL SERVICE







Robert Bradshaw PO Box 473 Calder, ID 83808-0473

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www.usps.co

HOW TO USE:

1. COMPLETE ADDRESS LABEL AREA

address and addressee information

Type or print required return

in customer block (white area) or on label (If provided).

2. PAYMENT METHOD

1)AY H. SORENSEN, ATTORNEY

· ROBERTA, 1715on, CARE OF

FOR ROBERT A. BISOM

Indicated in upper right hand corner. Affix postage or meter strip to area



Remove label backing and adhere 3. ATTACH LABEL (Il provided)

over customer address block area (while area), ◆ PLACE LABEL HERE ◆

Box 8022

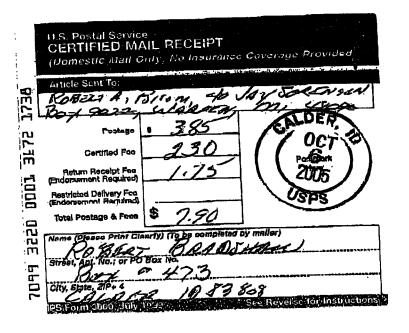
J HANGHA,

You don't have to weigh the envelope... Just pack all your correspondence and The efficient FLAT RATE ENVELOPE.

documents inside and pay only the FLAT RATE Priority Mail postage. We Deliver.

11/10/2002 13:38 **2082454931**

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY				
Complete items 1, 2; and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: ROBERT A. BIJON CE JAIJ A. SOREWSEN ATTAKKEY FOR RUBLAT A. BIJONN	Agent Addressee B. Received by (Printed Name) C. Date of Delivery Dends Bender 1 1 200 D. Is delivery address different from item 1? If YES, enter delivery address below: No MAIN PO WARREN, MI 48094				
40 540 56 HAI NO BOX 7022 WARREN, NI 48090	3. Service Type Grant Grant Grant Grant Grant Replaced Grant Grant Grant Replaced Grant Grant Grant Insuled Mall Grant Grant Grant Restricted Delivery? (Extra Foo) Grant Grant Yes				
2. Article Number (Transfer from contrar liber) 2027 3240. Of PS Form 3811, August 2001 Domocillo Rol	03/ 38/2 1038				



EXA

Nov-02-2005 09:47 From-US DISTRICT COURT, NMI

+18702862610 T-092 P.002/005 F-411

NO 133 (Rev. 9/R9) Bill of Costs	
United States	DISTRICT COURT
•	rict of
POBERT D. BRADBYAN	BILL OF COSTS
COMMONUTEDITA OF THE	Case Number: 05-0047
Judgment having been entered in the above antitled action of	Nor 10, 2005 against ROBSETA. BUSIN
the Clerk is requested to tax the following as costs:	Dife
Forms of the Clerk	s 250,00
Fees for service of summons and subpoens	
Pees of the court reporter for all or any part of the transcript ne	ressarily obtained for use in the case
Faces and dishursements for printing	
Fccs for witnesses (itemize on reverse side)	0.00
Focs for exemplification and copies of papers necessarily obtain	ned for use in the case
Docket flees under 28 U.S.C. 1923	
Costs as shown on Mandate of Court of Appeals	
Compensation of court-appointed experts	
Compensation of interpreters and costs of special interpretation	services under 28 U.S.C. 1828
Other costs (please itemize)	1524.36
•	TOTAL \$ 222 0.00
SPECIAL NOTE: Attach to your bill an itemization and docu-	mentation for requested costs in all categories.
DECI	ARATION
I declars under penalty of perjury that the foregoing coats are for which fees have been charged were actually and necessarily propaid to. Signature of Attentoy: Only the coats are sometimes and account account and account and account account and account and account account and account account and account account and account account account and account and account account account account and account account account and account accou	represent and were necessarily incurred in this action and that the services by performed. A copy of this bill was mailed today with postage and the services to the services of the services
Name of short for flo &	ELT DI BERNSHAW
For: Name of Claiming Party	1910 Date: Nov 10, 2005
Costs are taxed in the amount of	and included in the judgment.
Cleak of Count	
AINY AT WALL	Deputy Clerk Dato

Nov-02-2005 09:47

From-US DISTRICT COURT, NMI

+18702862910

T-092 P.003/005 F-411

WITNESS FEES (computation, cf. 28 U.S.C. 1821 for statutory fees)									
	ATTENDANCE		ATTENDANCE SU		SUBSIS	LENCE		AGE.	Total Cost
name and residence	Days	Total Cost	Days	Cost.	Miles	Total Cost	HACH WITHCH		
							\$0.00		
							\$0.00		
							\$0.00 .		
							\$0.00		
							\$0.00		
							\$0.00		
		,			т	OTAL	\$0.00		

NOTICE

Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:

"Sec. 1924. Verification of bill of costs."

"Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall strack thereto an affidavic, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been increasarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed,"

See who Section 1920 of Title 28, which reads in part as follows:

"A hill of costs shall be filed in the case and, upon allowance, included in the judgment or decree."

The Federal Rules of Civil Procedure contain the following provisions: Rule 54 (d)

"Except when express provision therefor is made either in a statute of the United States or in these rules, costs shall be allowed as of course to the prevailing party unless the court otherwise directs, but costs against the United States, its officers, and agencies shall be imposed only to the extent permitted by law. Costs may be taxed by the clerk on one day's notice. On motion served within 5 days thereafter, the action of the clerk may be reviewed by the court."

"Whenever a party has the right or is required to do some act or take some proceedings within a prescribed period after the service of a notice or other paper upon him and the notice or paper is served upon him by mail. 3 days shall be added to the prescribed period."

Rule 58 (In Part)

"Entry of the judgment shall not be delayed for the taxing of costs."

Robert D. Bradshaw PO Box 473 1530 W. Trout Creek Road Calder, Idaho 83808 Phone 208-245-1691

Plaintiff, Pro Se

IN THE UNITED STATES DISTRICT COURT FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW) Civil Action No. 05-0027 Plaintiff V. COMMONWEALTH OF THE NORTHERN) AFFIDAVIT IN SUPPORT OF MARIANA ISLANDS (horoafter referred to) COSTS ON CNMI USDC CASE as the CNMI); 05-0027 FOR DEFAULT MOTION AGAINST ROBERT et. al. A. BISOM Defendants

> Costs on USDC of CNMI Case 05-0027 Robert D. Bradshaw v, CNMI, et. al.

July 25, 2005 to Nov 1, 2005

Long Distant Phone Calls Fax	\$	50.80 6.22
Postage		227.35
Automobile and Travel Legal and Research		462.50 600.00
Bank Charges and interest Miscellaneous		100.00
WIISCELIAMEOUS		77.49
Total Other Costs	\$ 7	1524.36

Add:
Court Fees \$ 250.00
Costs of copies and reproductions 445.64

Total All Costs \$2220.00

AFFIDAVIT

I certify and affirm that I have personal knowledge of the facts on the above costs; that each item is correct; that the noted costs were necessarily incurred in the case; and that the services for which fees have been charged were actually and essentially performed.

Robert D. Bradshaw, Plaintiff, Pro Se

STATE OF IDAHO COUNTY OF BENEWAH

, Jerry Lee Nelson	<u> </u>	, Notary in and for the State of
Idaho, residing at st.	Maries, Idaho	_ do hereby certify that on
this <u>10</u>	day of <u>November</u>	2005, personally
appeared before me Rober	t D. Bradshaw, to me know	n to be the individual described
in and who executed the wi	ithin instrument for the uses	and purposes herein
mentioned.		
Given Under My hand and	Official Seal; this 10	day of <u>November</u> 2005.
JERRY LEE NELSON Notary Public State of Idaho		AND FOR THE STATE OF IDAHO MENT EXPIRES
	11/15/	07

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CERTIFICATE OF SERVICE

I HEREBY CFRTIFY that on the May of May __ 2005, I caused to be served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022 The Attorney General, 2d Floor of the Juan A. Sablan Memorial Bldg, Caller Box 10007, Capitol Hill, Saipan, MP 96950.

Robert D. Bradshaw, Plaintiff, Pro Se

Robert D. Bradshaw PO Box 473 1530 W. Trout Creek Road Calder, Idaho 83808 Phone 208-245-1691

Plaintiff, Pro Se

IN THE UNITED STATES DISTRICT COURT FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW) Civil Action No. 05-0027 Plaintiff V. COMMONWEALTH OF THE NORTHERN) AFFIDAVIT IN SUPPORT OF MARIANA ISLANDS (hereafter referred to) COSTS ON ID USDC CASE as the CNMI);) 05-0084 FOR DEFAULT et. al. MOTION AGAINST ROBERT A. BISOM Defendants

Costs on USDC of Idaho Case 05-0084 Robert D. Bradshaw v, CNMI, et. al. Mar 7, 2005 to July 25, 2005

Long Distance Phone calls	\$ 91.95
Fax	34.22
Copies	459.35
Postage	299.57
Bank charges and Interest	97.22.
Legal and Research	2575.00
Process Service	794.55
Locator Service	347.00
Typing	30.00
Notary Fees	18.14
Court Fees	272.40
Supplies	258.47

11 KY 11 121

Automobile and Travel Miscellaneous

2360.60 366.68

Total All Costs

\$8005.15

Less Amount rounded for pleading in Case 05-0027

5.15

Net Total Costs on Case

\$8000.00

AFFIDAVIT

I certify and affirm that I have personal knowledge of the facts on the above costs; that each item is correct; that the noted costs were necessarily incurred in the case; and that the services for which fees have been charged were actually and essentially performed

Robert D. Bradshaw, Plaintiff, Pro Se

STATE OF IDAHO COUNTY OF BENEWAH

Jerry Lee Nelson		Notary in and for the State of
Idaho, residing at st. m	aries, Idaho	do hereby certify that on
this <u>10</u>	day ofNovember	2005, personally
appeared before me Robert	D. Bradshaw, to me known	n to be the individual described
in and who executed the wit	hin instrument for the uses	and purposes herein
mentioned.		
Given Under My hand and C	Official Seal; this	day of <u>November</u> 2005.
JERRY LEE NELSON		ND FOR THE STATE OF IDAHO
Notary Public	61	

JERRY LEE NELSON Notary Public

MY APPOINTMENT EXPIRES

11/15/07

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the Moday of Nov 2005, I caused to be served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022 The Attorney General, 2d Floor of the Juan A. Sablan Memorial Bldg, Caller Box 10007, Capitol Hill, Saipan, MP 96950.

Robert D. Bradshaw, Plaintiff, Pro Se

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Robert D. Bradshaw PO Box 473 1530 W. Trout Creek Road Calder, Idaho 83808 Phone 208-245-1691

Plaintiff, Pro Se

IN THE UNITED STATES DISTRICT COURT FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW)	Civil Action No. 05-0027
Plaintiff		
٧.		
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS (hereafter referred to as the CNMI); et. al.)	AFFIDAVIT IN SUPPORT OF COSTS ON CNMI CASE 96-1320 FOR DEFAULT MOTION AGAINST ROBERT A. BISOM
Defendants	5	At bloom

Costs on CNMI Civil Case 96-1320 Robert A. Bisom v. Robert D. Bradshaw Before March 7, 2005

Telephone calls, fax, and postage

\$230.00

AFFIDAVIT

I certify and affirm that I have personal knowledge of the facts on the above costs; that each item is correct; that the noted costs were necessarily incurred in the case; and that the services for which fees have been charged were actually and essentially performed.

Robert D. Bradshaw, Plaintiff, Pro Se

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Jerry Lee Nelson	<u> </u>	Notary in and for the State of
Idaho, residing at st. Mar	iec, Idsho	do hereby certify that on
this	day of November	2005, personally
appeared before me Robert	D. Bradshaw, to me known	n to be the individual described
in and who executed the wi	thin instrument for the uses	and purposes herein
mentioned.		
Given Under My hand and	Official Seal; this 10	day of November 2005.
		NO FOR THE STATE OF IDAHO
JERRY LEE NELSON Notary Public State of Idaho		MENT EXPIRES
	11/15/07	

CERTIFICATE OF SERVICE

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022 The Attorney General, 2d Floor of the Juan A. Sablan Memorial Bldg, Caller Box 10007, Capitol Hill, Saipan, MP 96950.

Robert D. Bradshaw, Plaintiff, Pro Se

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